

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	CHAPTER 11
	§	
KRISJENN RANCH, LLC, <i>et al</i>	§	CASE NO. 20-50805-rbk
	§	
DEBTOR	§	(Jointly Administered)

**DECLARATION OF KEN HOERSTER IN SUPPORT OF DEBTOR'S
APPLICATION TO EMPLOY KEN HOERSTER AND TEXAS
RANCHES FOR SALE AS REAL ESTATE BROKER**

I, KEN HOERSTER, declare:

1. I am currently employed as the President with Texas Ranches for Sale ("Texas Ranches"), and have been working as a sales professional in the real estate industry for many years, from which I have developed a particular expertise in facilitating the purchase and sale of farm and ranch property.

2. I am over the age of 18 years and have personal knowledge of each of the facts stated herein, except as may be otherwise stated below, and would testify thereto if called upon to do so in a court of law.

3. I was retained, subject to Bankruptcy Court approval, to represent the Debtor as a real estate listing agent regarding a property owned by the Debtor which they intend to sell. The scope of my representation is summarized in the Sales Agreement (the "Agreement"), a copy of which is attached hereto as Exhibit "A."

4. Pursuant to the terms and conditions of the Agreement, my compensation for providing professional sales services for the property described hereinafter, following Court approval, will be 4.500% of the sales price if the buyer is represented by a buyers broker, and 3% if a buyer is not represented by an outside broker. This compensation structure is reasonable, standard, and in accordance with real estate industry practices.

5. The property I was retained to sell is as follows:

- a. Land situated in Uvalde County, Texas described as follows: 980 +/- Acres out of
A0164 ABSTRACT 0164 SURVEY 687 21.04, A0165 ABSTRACT 0165
SURVEY 689 950.36;

6. To the best of my knowledge, information, and belief, neither Texas Ranches nor I are creditors or insiders of the Debtor. Moreover, neither Texas Ranches nor I hold any prepetition claims against the Debtor.

7. To the best of my knowledge, information, and belief, neither Texas Ranches nor I represent or hold any interest which is adverse to the Debtor or the bankruptcy estate with respect to the matters on which we are to be employed.

8. To the best of my knowledge, information, and belief, except as set forth above, neither Texas Ranches nor I have any connection with the Debtor, creditors, or any other party in interest, their respective attorneys and accountants, or the United States Trustee or any employee of the office of the United States Trustee.

9. Based on my experience and expertise in the real estate industry, I am well qualified to represent the Debtor in connection with the matters set forth herein and as such my retention is in the Debtor's best interest, the best interest of the bankruptcy estate, and the Debtor's creditors.

I declare under penalty of perjury of the laws of the United States of America and the state of Texas that the foregoing is true and correct, and that this declaration was executed on July 8th 2021, at Comfort, Texas.



Ken Hoerster, President